

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 17-mc-00151-LPS

ALTANA CREDIT OPPORTUNITIES FUND
SPC, ALTANA CREDIT OPPORTUNITIES
FUND 1 SP, and ALTANA FUNDS LTD.
CAYMAN,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 23-mc-00608-LPS

NOTICE OF WITHDRAWAL AS ADDITIONAL JUDGMENT CREDITOR

1. On July 27, 2023, the Court entered a memorandum order (D.I. 646)¹ in which, *inter alia*, the Court outlined seven steps that creditors must complete to participate in the sale as an Additional Judgment Creditor (the “Steps”).

2. On October 11, 2023, the Court directed any party seeking to become an Additional Judgment Creditor to notify the Court of all completed Steps with supporting documentation (D.I. 738, ¶ 3).

¹ All references to the docket index (“D.I.”) are to the *Crystallex International Corp. v. Bolivarian Republic of Venezuela* docket, No. 17-mc-00151-LPS, unless otherwise noted.

3. On December 21, 2023, Plaintiffs Altana Credit Opportunities Fund SPC, Altana Credit Opportunities Fund 1 SP, and Altana Funds Ltd. Cayman (collectively, “Plaintiffs” or “Altana”) notified the Court of the completion of Steps 1-4 (D.I. 813).

4. On January 26, 2024, Plaintiffs notified the Court of the completion of Step 5 (D.I. 894).

5. On March 12, 2024, Plaintiffs notified the Court of the completion of Step 6 (D.I. 1044).

6. On April 9, 2024, Plaintiffs notified the Court of the completion of Step 7 (D.I. 1112).

7. On March 7, 2025, Plaintiffs notified counsel for the Special Master that Plaintiffs intended to withdraw from the impending sale and sought confirmation that, as a result, Plaintiffs will not be entitled to share in proceeds of the sale but would still receive their share of the reimbursement of the Special Master’s legal fees paid to date.

8. On March 27, 2025, the Special Master’s counsel confirmed the same.

9. As a result, Plaintiffs hereby notify the Court that it is withdrawing as an Additional Judgment Creditor for purposes of participating in the impending sale. Pursuant to Plaintiffs’ communications with counsel for the Special Master, Plaintiffs will no longer share in the proceeds of the sale but will be reimbursed for their share of the legal fees paid to date out of the proceeds of such sale.

10. Plaintiffs do not waive, and hereby expressly maintain and reserve, their rights as U.S. judgment creditors to attach the assets of Venezuela, Petróleos de Venezuela, S.A. (“PDVSA”), and any other alter ego of Venezuela and/or PDVSA, consistent with U.S. law and this Court’s prior rulings.

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